

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION**

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817

Case No. 18-cv-00864

Honorable Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

DEALERSHIP CLASS PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Dealership Class Plaintiffs respectfully request leave to file their Motion to Convert The Reynolds and Reynolds Company's Motion to Dismiss the Consolidated Class Action Complaint Pursuant to Rule 12(b)(6) to a Motion for Summary Judgment and Stay Further Briefing (the "Motion to Convert"), including its exhibits, under seal. The Motion to Convert and the exhibits thereto contain information that has been designated as "HIGHLY CONFIDENTIAL" or "CONFIDENTIAL" under the Agreed Protective Order (Dkt. No. 104). Dealership Class Plaintiffs will file a public, redacted version of the Motion to Convert and the exhibits thereto.

Dated: July 25, 2018

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth (pro hac vice)

Dealership Interim Lead Class Counsel

Elizabeth McKenna (pro hac vice)

MILBERG TADLER PHILLIPS

GROSSMAN LLP

One Pennsylvania Plaza, 19th Floor

New York, NY 10119

Tel: (212) 594-5300

Fax: (212) 868-1229

pwedgworth@milberg.com

emckenna@milberg.com

Leonard A. Bellavia (pro hac vice)
Plaintiffs' Steering Committee
Steven Blatt
BELLAVIA BLATT, PC
200 Old Country Road, Suite 400
Mineola, New York 11501
Tel: (516) 873-3000
Fax: (516) 873-9032
lbellavia@dealerlaw.com
sblatt@dealerlaw.com

James E. Barz
Plaintiffs' Steering Committee
Frank Richter
Plaintiffs' Steering Committee
**ROBBINS GELLER RUDMAN &
DOWD LLP**
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
Tel: (312) 674-4674
Fax: (312) 674-4676
jbarz@rgrdlaw.com
frichter@rgrdlaw.com

Daniel C. Hedlund (pro hac vice)
Plaintiffs' Steering Committee
Michelle J. Looby (pro hac vice)
Plaintiffs' Steering Committee
Daniel E. Gustafson
David A. Goodwin
Daniel J. Nordin
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Tel: (612) 333-8844
Fax: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dgoodwin@gustafsongluek.com
mlooby@gustafsongluek.com
dnordin@gustafsongluek.com

David W. Mitchell (pro hac vice)
Alexandra S. Bernay
Carmen A. Medici
**ROBBINS GELLER RUDMAN &
DOWD LLP**
655 West Broadway, Suite 1900
San Diego, CA 92101
Tel: (619) 231-1058
Fax (619) 231-7423
davidm@rgrdlaw.com
xanb@rgrdlaw.com
cmedici@rgrdlaw.com

Robert A. Clifford
Liaison Counsel
Shannon M. McNulty
Kristofer S. Riddle
CLIFFORD LAW OFFICES, P.C.
120 N. LaSalle Street, 31 Floor
Chicago, Illinois 60602
Tel: (312) 899-9090
Fax: (312) 251-1160
RAC4cliffordlaw.com
SN4M@cliffordlaw.com
KSR@cliffordlaw.com

CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on July 25, 2018, caused a true and correct copy of the foregoing DEALERSHIP CLASS PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL, to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth_____

Peggy J. Wedgworth

MILBERG TADLER PHILLIPS GROSSMAN LLP

One Pennsylvania Plaza, 19th Floor

New York, NY 10119

(212) 594-5300

pwedgworth@milberg.com